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17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 NATIONAL URBAN LEAGUE, *et al.*,

21 Plaintiff,

22 v.

23 WILBUR L. ROSS, JR., *et al.*,

24 Defendants.

25 Case No. 5:20-cv-05799-LHK

26 **DECLARATION OF**
27 **JAMES T. CHRISTY**

1 I, James T. Christy, make the following Declaration pursuant to 28 U.S.C. § 1746, and state
2 that under penalty of perjury the following is true and correct to the best of my knowledge and
3 belief:

- 4 1. This is my ninth declaration in this lawsuit. I am making this declaration in response to
5 Court Orders ECF 270, ECF 271, ECF 272 and ECF273.

6 **ECF 270 Investigation**

- 7 2. Order 270 – Email to Court dated 9/30/2020 from an enumerator in the Oakland, CA
8 Area Census Office who states “Apparently we have completed more than 99.5% of
9 our work in Oakland but I do not know what standard they use”. He also expresses
10 concern about the homeless count, stating “we only did one night”.
11 3. The reference to completed work is correct. As of 7:18am on 9/30/2020, the Oakland
12 ACO completed 99.6% of its production workload for the Nonresponse Followup
13 operation. 128 enumerators received assignments to finish the remaining 600
14 addresses.
15 4. As to the reference to completing the homeless count in only one night, the 2020
16 Census Detailed Operational Plan for Group Quarters Operation (September 2017),
17 page 51, notes “TNSOLS will be enumerated on April 1, 2020”. This date was
18 amended to September 24 as part of the COVID-19 Plan.

19 **ECF 271 Investigation**

- 20 5. Order 271 – Email to Court dated 9/30/2020 from an enumerator who worked between
21 September 4 and September 17 and has comments on the system application used to
22 collect household data.
23 6. The complainant in Order 271 does not appear to allege a violation of the Court’s
24 Preliminary Injunction.

25 **ECF 272 Investigation**

- 26 7. Order 272 – Email to Court dated 9/30/2020 is from an enumerator who “...received a
27 message from my census supervisor instructing us that enumeration for our zone, Zone
28 6, is ending TODAY, Sept 30th, with other zones ending by October 6...”

1 8. Without specific information, I cannot verify the veracity of the reference to this area
2 finishing enumeration on September 30. As I have noted in other declarations, there
3 are Census Field Areas across the Nation which are in or have completed the Closeout
4 Phase.

5 9. I am not aware of any reference to or discussion of an October 6 end date.

6 **ECF 273 Investigation**

7 10. Order 273 – Email to the Court dated 9/30/2020 is from an enumerator in Las Vegas,
8 NV who alleges “...they have basically stopped enumerating households and did not
9 enumerate the homeless population here in Nevada...”

10 11. These allegations are not correct. Overall, enumeration in the State of Nevada is 99.2%
11 complete when combining both those who self-responded by internet, phone or paper
12 and those where we collected a response via a census enumerator. For the Nonresponse
13 Followup component of this work, 98.2% of the addresses have been resolved. We are
14 continuing to enumerate people in Nevada. As of 7:18am Eastern on September 30,
15 2020, 681 enumerators received assignments and are working in State of Nevada.

16 12. As for the assertion that we did not enumerate the homeless population in Nevada, that
17 is also not true. For the Service-Based Enumeration operations, we visited 592
18 facilities and locations to conduct enumeration efforts for persons experiencing
19 homelessness in Nevada.

20
21 I have read the foregoing and it is all true and correct.

22 DATED this _30th_ day of September, 2020

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24 _____
25 James T. Christy

26 Assistant Director for Field Operations

27 United States Bureau of the Census

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